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24 UNITED STATES DISTRICT COURT

25 NORTHERN DISTRICT OF CALIFORNIA

26 ZOYA KOVALENKO,

27 Plaintiff,

28 v.

KIRKLAND & ELLIS LLP, MICHAEL DE  
 21 VRIES, MICHAEL W. DE VRIES, P.C.,  
 22 ADAM ALPER, ADAM R. ALPER, P.C.,  
 AKSHAY DEORAS, AKSHAY S. DEORAS,  
 P.C., AND MARK FAHEY,

Defendants.

Case No. 4:22-CV-05990-HSG (TSH)

**DECLARATION OF JOSEPH C.  
 LIBURT IN SUPPORT OF JOINT  
 STATEMENT IN SUPPORT OF  
 FILIPPATOS PLLC'S  
 ADMINISTRATIVE MOTION TO  
 PARTIALLY SEAL FILIPPATOS  
 PLLC'S MOTION TO QUASH  
 SUBPOENA OF FILIPPATOS PLLC'S  
 BANK RECORDS AND FOR  
 PROTECTIVE ORDER AND  
 SANCTIONS**

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DECLARATION OF JOSEPH C. LIBURT  
 ISO JOINT STATEMENT IN SUPPORT OF  
 ADMINISTRATIVE MOTION TO  
 PARTIALLY SEAL [4:22-CV-05990-HSG  
 (TSH)]

I, Joseph C. Liburt, hereby declare:

1. I am a partner at the law firm of Orrick, Herrington & Sutcliffe, LLP. I represent Defendants Kirkland & Ellis LLP, Michael De Vries, Michael W. De Vries, P.C., Adam Alper, Adam R. Alper, P.C., Akshay Deoras, Akshay S. Deoras, P.C., and Mark Fahey (collectively, “Defendants”) in this matter. I submit this declaration in support of the parties’ Joint Statement in Support of Filippatos PLLC’s Administrative Motion to Partially Seal Filippatos PLLC’s Motion to Quash Subpoena of Filippatos PLLC’s Bank Records and for Protective Order and Sanctions (the “Motion to Seal”). I have personal knowledge of the matters contained in this declaration. If called to testify to the matters set forth in this declaration, I would do so competently.

2. Good cause exists to seal the redactions identified in the Motion to Seal for the reasons set forth therein. Based on my professional experience, disclosure of these discussions would prejudice both Defendants' and Plaintiff's interests in this action.

3. Filippatos PLLC has tailored its request to redact only confidential information.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 28, 2025.

/s/ Joseph C. Liburt  
Joseph C. Liburt

DECLARATION OF JOSEPH C. LIBURT  
ISO JOINT STATEMENT IN SUPPORT OF  
ADMINISTRATIVE MOTION TO  
PARTIALLY SEAL [4:22-CV-05990-HSG  
(TSH)]